

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PJM INTERCONNECTION, LLC, directly )  
and derivatively on behalf of Power Edge, )  
LLC, )  
Plaintiff, )  
v. )  
MARK GORTON, TOWER RESEARCH )  
CAPITAL LLC, TOWER RESEARCH )  
CAPTIAL INVESTMENTS, LLC, ACCORD )  
ENERGY, LLC, BJ ENERGY, LLC, )  
FRANKLIN POWER, LLC, GLE TRADING, )  
LLC, OCEAN POWER, LLC, PILLAR )  
FUND, LLC, AND POWER EDGE LLC, )  
Defendants. )

**MOTION AND ORDER  
FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of David B. Tulchin, Richard J.L. Lomuscio and Brian L. Frye to represent defendants in this matter.



Daniel A. Dreisbach (#2583)  
dreisbach@rlf.com  
Steven J. Fineman (#4025)  
fineman@rlf.com  
Richards Layton & Finger  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801  
302-651-7700  
Attorneys for Defendants

Dated: May 7, 2008

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel's motion for admission *pro hac vice* is granted on this \_\_\_\_\_ day of May, 2008.

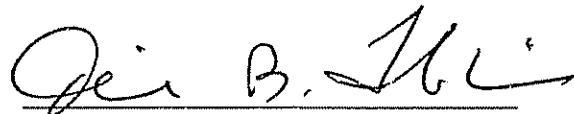
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United States District Judge

**CERTIFICATION BY COUNSEL  
TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I hereby certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee for \$25.00 has been paid

to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted  to the Clerk's Office upon the filing of this motion.



David B. Tulchin  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004-2498

Dated: May 6, 2008

**CERTIFICATION BY COUNSEL  
TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I hereby certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York and State of New Jersey, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee for \$25.00 has been paid  to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted  to the Clerk's Office upon the filing of this motion.



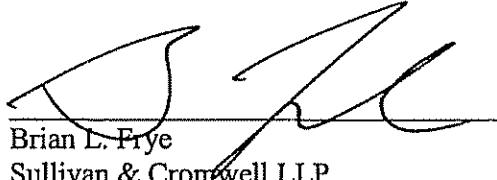
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Richard J.L. Lomuscio  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004-2498

Dated: May 6, 2008

**CERTIFICATION BY COUNSEL**  
**TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I hereby certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of New York, and pursuant to Local Rule 83.6, submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective 1/1/05, I further certify that the annual fee for \$25.00 has been paid  to the Clerk of the Court, or, if not paid previously, the fee payment will be submitted  to the Clerk's Office upon the filing of this motion.



Brian L. Frye  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004-2498

Dated: May 6, 2008

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2008, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing(s) and Hand Delivered to the following:

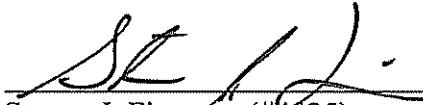
**BY HAND DELIVERY**

Collins J. Seitz, Jr., Esquire  
Max B. Walton, Esquire  
Connolly Bove Lodge & Hutz LLP  
The Nemours Building  
1007 North Orange Street  
8th Floor  
P.O. Box 2207  
Wilmington, DE 19899

I hereby certify that on May 7, 2008, I have sent by Federal Express, the foregoing document to the following non-registered participant:

**BY FEDERAL EXPRESS**

Eric N. Macey, Esquire  
Novack & Macey LLP  
100 North Riverside Plaza  
Chicago, IL 60606-1501



\_\_\_\_\_  
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